REMARKS

This Amendment, submitted in response to the Office Action dated December 21, 2005,

is believed to be fully responsive to each point of rejection raised therein. Accordingly,

favorable reconsideration on the merits is respectfully requested.

Claims 1-32 are now all the claims pending in the application.

I.   Rejection of claim 31 under 35 U.S.C. § 112, first paragraph

Claim 31 has been rejected under 35 U.S.C. § 112, first paragraph as failing to comply

with the written description requirement. In particular, the Examiner asserts that the steps of

"storing said custom content object in said one or more object servers; storing attribute

information concerning the custom content object in said one or more object servers; and storing

information specifying the custom content object and the attribute information in the library

server" are not described in the specification. Claim 31 is amended and it is respectfully

submitted that the written description supports claim 31.

As previously submitted, "storing said custom content object in said one ore more object

servers" is described at, for example, page 8, lines 14-19 and page 9, lines 7-11 of the

specification. See also, Fig. 3, object server 48. These portions of the written description

describe the Digital Library 20, shown in Fig. 1 for example, and shown in more detail in Fig. 3.

Further, the specification describes an example of a custom content outline that is called a

custom book outline (CBO). See page 54, lines 13-15 ("In the current example for creating

custom textbooks, the CCO is called a custom book outline or CBO.") A CBO is stored in the

digital library as a part. See pg. 55, line 21 ("CBO according to the present example is stored as

a digital library part.") In the digital library described in the specification, "parts" are stored in the digital library's object servers. See page 10, lines 16-18 ("The object server 48 uses object server table 64 to manage storage of parts in its storage areas, such as the object store 50.") Accordingly, the specification describes storing a custom content object (e.g., a CBO) in a digital library object server.

The specification also describes an Attribute file "ATR" that contains information about the CBO that is stored in the digital library's library server. See page 39, lines 3-4 ("All Attribute Files are parsed and the resultant parametric data is stored in the digital library server 44.")

Accordingly, it is respectfully submitted that the specification provides written description support for the elements of claim 31.

Therefore, Applicant submits that the claim recitations are disclosed in the specification. Consequently, the 112, first paragraph rejection of claim 31 should be withdrawn.

II.   Claim Objections

Claims 1, 9 and 17 have been objected to for informalities. In particular, the Examiner asserts that "the list" in the step of adding the identifier should read "the list of content entity identifiers." Claims 1, 9 and 17 have been amended as suggested by the Examiner.

Claims 4, 12 and 20 have been objected to for informalities. In particular, the Examiner asserts that "the outline" in the step of adding the identifier should read "the hierarchical outline of containers and content entity identifiers." Claims 4, 12, and 17 have been amended as suggested by the Examiner.

Consequently, the objections to claims 1, 4, 9, 12, 17 and 20 should be withdrawn.

III.   Rejection of claims 1-31 under 35 U.S.C. § 102(b) and 103(a)

Claims 1-31 have been rejected under 35 U.S.C. § 102(b) as anticipated by or, in the

alternative, under 35 U.S.C. § 103(a) as being obvious over Vaughn [ezWriter 2.0 for Window;

hereinafter "Vaughn"].

Vaughn is directed to ezWriter which provides a method of storing and organizing data.

Vaughn was created to help writers organize outlines, notes and chapters. See Vaughn at page 2.

The ezWriter environment consists of two windows: the Outline window and the Writer window.

The Outline window lists all of the rich text files a user has included in their ezWriter collection

of files. When a user clicks on an entry in the Outline window, the corresponding files appears

in the Writer window. See Vaughn at page 4.   The Writer window of Vaughn is basically a

streamlined word processor. See Vaughn at page 5.

Claim 1

Claim 1 recites "having a user defining the content object by a list of content entity

identifiers." The Examiner asserts that Vaughn, page 7, paragraph 3, and the left hand side of

page 7, teach this aspect of the claim. The left hand side of page 7 discloses an Outline window

which contains an outline of files.   Paragraph 3 discloses that a user creates new files by

selecting the pull-down menu of the Outline window. A user then types in a name for the

collection of files. The Examiner appears to be asserting that the outline in the Outline Window

created by a user discloses the claimed content object and that the names gives to the files

discloses the claimed list of content entity identifiers.

Claim 1 recites "receiving *user-provided content*, assigning it an *identifier*, and storing it with its identifier in the *data repository*." The Examiner asserts that in Vaughn, the content of the "Introduction" which is received in the right hand side panel (Writer window) is given the title of "Introduction" and stored as a text file in the C drive. See Vaughn at page 4. The Examiner appears to be asserting that the C drive of a user's computer system discloses the claimed data repository and that content and files added by a user disclose the claimed user-provided content which is stored in a data repository.

Claim 1 further recites "*adding* the *identifier* of the user-provided content to the *list of content entity identifiers*, whereby the user-provided content is added to the *content object*." The Examiner asserts that pages 4 and 8 of Vaughn disclose adding entries to the outline and how the content of "Introduction" is added to the "Welcome to ezWriter" outline. However, the same aspect of Vaughn (adding "Introduction" to the outline) appears to be cited for teaching different aspects of the claimed invention (i.e., the "receiving" and "adding" steps).

The Examiner refers to the addition of content to a user's outline such as the addition of "Introduction" to the "Welcome to ezWriter" outline for teaching both receiving user-provided content which is stored in a data repository and for adding an identifier to a list of content entity identifiers and the user-provided content is added to the content object. In particular, the identifier ("Introduction") of the user-provided content cannot be added to the list of content entity identifiers (outline as shown on left hand side of page 7) as the Examiner asserts since the user-provided content ("Introduction") has already been stored in the data repository in the "receiving" step (outline stored on the C drive according to the Examiner). Therefore, the

Examiner is citing the same operation of Vaughn, the addition of content to the outline, for

teaching distinguishable aspects of the claim.

Since the Examiner has not shown that all of the elements of claims are disclosed in the

cited art, claim 1 and its dependent claims should be deemed allowable. Since claims 4, 9, 12,

17, 20 and 31 recite similar elements, claims 4, 9, 12, 17, 20 and 31 and their dependent claims

should be deemed allowable for at least the same reasons.

Claim 31

To the extent claim 31 recites elements similar to claim 1, it should be deemed allowable

for at least the same reasons set forth above.

Claim 31 recites "storing said custom content object in said one ore more *object servers*;

and storing information specifying the custom content object and attribute information

concerning the custom content object in the *library server*." The Examiner asserts that ezWriter

folder "\ezWriter" discloses the claimed object server. However, the ezWriter folder does not

teach or suggest the claimed object server which would be apparent to one of ordinary skill in the

art.

For at least the above reasons, claim 31 should further be deemed allowable.
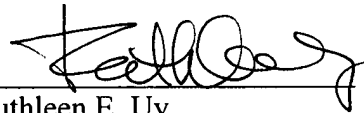
IV.   New Claim

Applicant has added claim 32 to provide a more varied scope of protection. Claim 32 should be deemed allowable by virtue of its dependency to claim 1 for at least the reasons set forth above.

V.   Conclusion

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,

SUGHRUE MION, PLLC   Ruthleen E. Uy
Telephone: (202) 293-7060   Registration No. 51,361
Facsimile: (202) 293-7860

WASHINGTON OFFICE

23373

CUSTOMER NUMBER

Date: March 21, 2006